

* response by EPA
, received by EPA. ~~NO DATE~~
5a

AK0701

MAPCO

Requirements of.

3008(a)

- ✓ 1) report describing waste management. 30 day. Feb 03, 1989
no response ^{EPA} reg
- ✓ 2) doc for storage area, Tank 192, sump + surface impoundment. (60 days) Mar 6, 1989
- ✓ a) develop WAP. no response ^{EPA} reg.
 - ✓ b) inspection procedures.
 - ✓ c) operating records.
 - ✓ d) financial.
- ✓ 2a) payment of civil penalty. final payment received
- ✓ 3) plan + schedule for completing pre-closure investigations + submitting closure plans. April 5, 1989.
letter by EPA June 5, 1989.
re - requirement for closure plans
- 4) Submittal of closure plans. (Summer - Fall 1989)

CHANGED

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MAPCO

- received by EPA.
- response by EPA.

Requirement of 3008(h) order

1). IM workplan (90 days) - April 10, 1989.

waste areas. { Lagoon B.
Tank 192.

Sumps no. 901, 905, 909-6, 05-7.

should relate to closure plans.

Approval by EPA

30 days for re-submitted

2). RFI workplan.

I Facility Background. - April 10, 1989.

Nature + Extent of Cont.

Implementation of Interim Measures.

II Initial assessment of corrective measure technologies.

April 10, 1989. (90 days)

III RFI Workplan Requirements (120 days). - May 8, 1989.

Approved by EPA.

3). Draft RFI report. 30 days after completion of RFI

4). Final RFI - 30 days after receipt of EPA comments.

5). Draft CMS workplan.

6). Evaluation of corrective measure alternative or alternatives.

General Comments

- 1). Will be submitting comments on interim measures workplan.
May re-submit one document. closure plan / interim measures plan which will satisfy 3008(a) + 3008(h) requirements. - see June 5, 1989 letter on closure + forthcoming comment on IM. - plan should also incorporate pre-closure investigations. (interested in one document that)
- 2). Upon receipt of corrective measures report. - public review ^{covers} closure process will start.

- 3). Comments on RFI Workplan ^(Task III) + description of current condition ^(Task I)
sent within next 10-15 days.

Task II - no comments.

- 4). Closure of lagoon B should call for removal of all wastes + sampling for waste + constituents. May not want to fill in lagoon until after closure plan approved.
- 5). Closure process. will get facility out of "TSD" status.
Any remaining constituents re Appendix III or Appendix VIII may be handled under part 264 equivalency demonstration, under CMS, or post closure permit.

- 6). Close by removal. - If the waste constituents in the unsaturated soil exceed agency established health + environmental effects levels close by removal may not be possible
groundwater monitoring will be required.
- 7). A post closure permit is not required if the unit closes by removal under standards equivalent to 264. standard
The terms of any 3008(h) may be made part of the post closure permit, as appropriate.
- 8.) RFI should address those areas of concern identified in the RFA.
- 9) Uncontaminated groundwater is a requirement for clean closure.
- 10) Closure plan should include a standard which is intended to be used to determine whether removal or decon is achieve in soils. ie using agency established levels Rfd's etc
To make the demonstration w/r respect to ground-water must remove enough top subsols or gw. to demonstrate that constituent levels in gw do not exceed agency established chronic health levels.